

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Christopher P. Fields, Esq. (SBN 174155) LEE & FIELDS, APC 3731 Wilshire Blvd., Ste. 940 Los Angeles, CA 90010 Tel: (213) 380-5858 Fax: (213) 380-5860 chrisfields@leefieldslaw.com</p>		<p>FOR COURT USE ONLY</p>	
<p><input type="checkbox"/> Individual appearing without attorney <input checked="" type="checkbox"/> Attorney for: Greg and Charlene Peale, Debtors</p>			
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>			
<p>In re:</p> <p>Gregory A. Peale and Charlene J. Peale,</p>		<p>CASE NO.: 2:12-bk-41452 CHAPTER: 7</p>	
<p>Debtor(s).</p>		<p>APPLICATION FOR ORDER SETTING HEARING ON SHORTENED NOTICE [LBR 9075-1(b)]</p>	

1. Movant applies under LBR 9075-1(b) for an order setting a hearing on shortened notice on the following motion:
 - a. Title of motion: Dtors' Ex Parte App to Reopen Ch 7 BK to Enlarge Time to File Motion to Vacate Judgment Liens
 - b. Date of filing of motion: 3/13/2013
2. Compliance with LBR 9075-1(b)(2)(A): (***The following three sections must be completed***):
 - a. Briefly specify the relief requested in the motion:

Debtors request an emergency hearing in order to reopen their recently discharged chapter 7 bankruptcy in order to allow them the opportunity to file motions to vacate three judgment liens in the amounts of \$6,377.57, \$2,157.89 and \$3,788.52 totalling \$12,323.98.

- b. Identify the parties affected by the relief requested in the motion:

Debtors, Greg and Charlene Peale. Judgment lien creditors, Capital One Bank (\$6,377.57), Attorney Collection Services, Inc.(\$2,157.89), and Professional Collection Consultants (\$3,788.52).

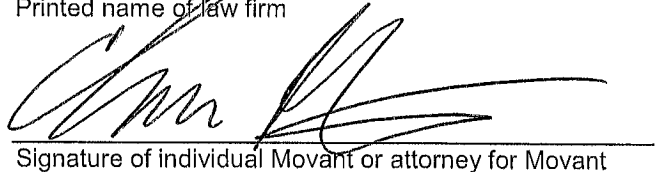
- c. State the reasons necessitating a hearing on shortened time:

Debtors have lived in their family home for over 30 years, which home is sheduled to be sold in a trustee foreclosure sale on Friday, March 15, 2013 at 9:00 a.m. Debtors have engaged Liberty Home Equity Solutions who have approved the funding of a reverse mortgage loan ready to fund as soon as these liens are vacated. Debtors will lose approximately 50,000 to \$60,000 of equity in their home if sold in foreclosure, impairing their homestead equity claim.

3. Compliance with LBR 9075-1(b)(2)(B): The attached declaration(s) justifies setting a hearing on shortened notice, and establishes a *prima facie* basis for the granting of the motion.
4. Movant has lodged a proposed Order Setting Hearing on Shortened Notice on mandatory form F 9075-1.1.ORDER .SHORT.NOTICE

Date: 3/13/2013

Lee & Fields, APC
Printed name of law firm


Signature of individual Movant or attorney for Movant

Christopher P. Fields, Esq
Printed name of individual Movant or attorney for Movant